

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
AMENDMENT OF PART 97 OF THE)	
COMMISSION'S RULES GOVERNING THE)	RM-10867
AMATEUR RADIO SERVICE TO)	
IMPLEMENT CHANGES TO ARTICLE 25)	
OF THE INTERNATIONAL RADIO)	
REGULATIONS ADOPTED AT THE 2003)	
WORLD RADIOCOMMUNICATION)	
CONFERENCE)	

To: The Commission

COMMENT

1. I urge the Commission to reject the Petition for Rulemaking RM-10867.

2. It is essential that the Amateur Radio Service remain a service of *trained operators, technicians, and electronics experts*.

§97.1 Basis and purpose.

The rules and regulations in this Part are designed to provide an amateur radio service having a fundamental purpose as expressed in the following principles:

- (a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.
- (b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.
- (c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communications and technical phases of the art.
- (d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.
- (e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

3. The Amateur Radio Service and the Commission do not benefit by allowing *unearned* upgrades. The Amateur Radio Service creates its own exams and administers them

using licensees as proctors. The only benefit to the Commission is a bit or two less data in the ULS database.

4. Amateur Radio licensees enjoy many priveleges and therefore have great responsibility. They are responsible to not cause interference to other services (e.g. police, fire, aircraft). They are also responsible so as to not cause harm to themselves or others (e.g. R. F. Safety, electrocution).

5. The Amateur Radio Service is not one of the *Personal Radio Services* (e.g. Citizens Band, GMRS, MURS, FRS). Therefore, to fulfill its *Basis and Purpose*, written exams must ensure a minimum level of competency. *Unearned* upgrades benefit no one — not the licensees, the communities we serve or the Commission.

6. The General class licensee should be required to demonstrate some proficiency in Morse code. A Morse code proficiency requirement ensures that Amateur Radio licensees are skilled for service during emergencies. A 5-wpm Morse code proficiency requirement ensures that radio amateurs licensed for high frequency operation will have a basic exposure to this skill. A proficiency of 5-wpm is merely the equivalent of memorizing the sounds of the characters. It is the most basic exposure possible to Morse code and this level of proficiency has been easily achieved by many licensees whose ages range from childhood to senior adults.

7. The Amateur Radio Service is a voluntary, non-commercial communication service. Licensees devote untold hours of volunteer service to train and provide communications during time of need (e.g. natural disasters). When phone lines are down, licensees provide the means and manpower to pass health, welfare and emergency traffic. Under less than ideal conditions, often with makeshift equipment and antennas, *skilled* radio amateurs are charged with the important task of getting the message through. Morse code (CW) provides a 13 dB signal advantage over single sideband (SSB) telephony (voice). In other words, when voice transmissions are no longer possible, licensees trained in the use of Morse code can easily switch from voice to radio-telegraphy to pass the traffic. When all else fails, Morse code can get the message across, provided there are those trained to copy code.

8. There are other efficient digital modes that offer similar signal enhancements over SSB (voice) and other inefficient wideband modes. However, these modes can not be decoded by ear and therefore require additional equipment. This equipment is not easily setup under field conditions. This equipment also requires additional electrical power capacity, which would limit operating time when using emergency power off of commercial mains. Further, all commercially manufactured Amateur Radio HF transceivers come equipped for Morse code (CW) telegraphy. Very few (if any) HF transceivers come equipped for digital modes (e.g. RTTY, PSK31, etc.) without the addition of other equipment (e.g. computer, software, TNC, video monitor, etc.).

9. I was licensed as an Amateur Radio operator in 1980. I currently hold an Amateur Extra class license and am a Volunteer Examiner (VE) with ARRL-VEC. I have served various leadership roles for local amateur radio clubs and have helped introduce amateur radio to hundreds of children and adults. I have taught Morse code in a classroom setting and one-on-one. I currently run several on-air Code Practice Nets¹ for the Robert F. Heytow Memorial Radio

¹ See <http://www.qsl.net/k9ya> for details and schedule.

Club. I am a member of FISTS CW Club, the Society of Midwest Contesters (SMC), American Radio Relay League (ARRL), and JARL A-1 Club. I have built and repaired amateur radio equipment, earned numerous operating awards and have written articles for several amateur radio publications. Unlike the Petitioner, I have no pecuniary interests in the amateur radio service.

10. The capability to send and receive Morse code is retained in the U.S. military service, is still being trained in military schools and is in use today in various military theaters throughout the world. “The performance standard for success is 13 code groups per minute. This would not be required or trained if it were not an absolute necessity. Training time is at a premium and unneeded skills are not maintained as requirements for army specialties.”²

Conclusion

11. I disagree with the Petitioner that licensees should be given unearned upgrades.

12. I disagree with the Petitioner that a Morse code proficiency exam be eliminated for General class.

13. The Amateur Radio Service must remain a skilled, technical service — not become another Personal Radio Service.

14. The ability to send and receive Morse code can mean the difference between life and death. CW (Morse code) provides a 13 dB advantage over SSB telephony (voice). A skilled operator can switch from voice to CW and get the message through when all else fails. A 5-wpm Morse code proficiency requirement for General class

15. The Basis and Purpose of the ARS clearly defines the obligations of the Amateur Radio Service with respect to providing emergency communications. The ability to send and receive Morse code is a vital part of providing emergency communications — when all else fails.

16. I urge the Commission to **REJECT** RM-10867 in its entirety.

17. I support **RM-10811** if the Commission determines that changes must be made to the Amateur Radio Service.

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² G.I. Joe and Mr. Morse by Lt. Col. Bart J. Hill, K7LTC. August 2003, 73 Amateur Radio Today magazine, 70 Hancock Rd., Peterborough, NH 03458-1107.